



Shannon S. S. Herzfeld
Vice President
Government Relations

Archer Daniels Midland Company
1401 New York Avenue, NW
Suite 520
Washington, DC 20005
T 202.572.0580
F 202.572.0588
shannon_herzfeld@admworld.com

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Honorable Franklin L. Lavin
Under Secretary for International Trade
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Dear Under Secretary Lavin

We understand that the Department of Commerce is seeking information as to whether Ukraine is eligible for market economy status. While a decision in anti-dumping does not have an affect on Archer Daniels Midland Company, we would like to share our experience with our business in Ukraine.

Archer Daniels Midland Company (ADM) is a world leader in agricultural processing. ADM is one of the world's largest processors of soybeans, corn, wheat and cocoa. ADM is also a leader in the production of soy meal and oil, ethanol, corn sweeteners and flour. In addition, ADM produces value-added food and feed ingredients. Headquartered in Decatur, Illinois, ADM has over 25,000 employees, more than 250 processing plants and net sales for the fiscal year ended June 30, 2005 of \$35.9 billion.

ADM is involved in a 50% / 50% joint venture sunflower seed extraction facility and edible oil import/export terminal in the port of Illechevsk (located in the Odessa region of the Ukraine). ADM also holds substantial ownership in Toepfer International which operates a Ukrainian corporate office located in Kiev. This office manages two import /export port silos, two river silos, nine inland grain and oilseed origination silos and operates a fleet of trucks providing logistical services to the network of facilities.

Overall, our experience has been positive and ADM is encouraged by business prospects. Based on our experience to date, we have found that the currency in Ukraine is convertible and that wages are determined by free bargaining between labor and management. We are currently involved in joint ventures as described above and have recently increased our foreign direct investment in Ukraine. ADM has not encountered any impediments to our business.

We hope our input has been helpful as you weigh this important question concerning Ukraine.

Sincerely,

A handwritten signature in blue ink that reads "Shannon S.S. Herzfeld".

Shannon S. S. Herzfeld